

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

JULIANA RODRIGUEZ MOREL
f/k/a JULIANA MOREL MARIANO,
Plaintiff

v.

1:21-CV-00040-AJ

MAMMOTH TECH, INC.
f/k/a CREDIT ADJUSTMENTS, INC.,
f/k/a CAI OF OHIO,
Defendant

MOTION TO CONTINUE
9/26/22 DAMAGES HEARING

NOW COMES counsel for Plaintiff, Douglas, Leonard & Garvey, P.C., and respectfully requests that this Honorable Court continue the Damages Hearing currently scheduled to take place on Monday, September 26, 2022, and, in support thereof, states as follows:

1. On the afternoon of September 20, 2022, Plaintiff's counsel received a call from Plaintiff's sister notifying that the Plaintiff had died unexpectedly on September 19, 2022.

2. Given the sudden nature of this news and discussions which remain to be had with Plaintiff's grieving family, Plaintiff's counsel is not yet in a position to file a formal notice of death with the Court as is suggested should be done under Fed. R. Civ. P. 25 and which will trigger a 90-day deadline for moving to substitute party.

3. Plaintiff's counsel at this juncture seeks a continuance of the damages hearing scheduled for September 26, 2022, of at least 60 days, to allow counsel to have productive discussions with Plaintiff's family surrounding substitution of party, unless the Court deems it proper for the hearing to proceed as scheduled in the Plaintiff's absence.

4. No memorandum of law is believed to be required, given the discretionary nature of the relief requested.

WHEREFORE, Plaintiff's counsel respectfully prays this Honorable Court:

- A. Continue the Damages Hearing currently scheduled to take place on Monday, September 26, 2022, unless the Court deems it proper to proceed in the Plaintiff's absence; and
- B. Grant such other and further relief as is just and equitable.

Respectfully submitted,
JULIANA RODRIGUEZ MOREL
By her attorneys,
DOUGLAS, LEONARD & GARVEY, P.C

Date: September 21, 2022

By: /s/ Megan E. Douglass
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was emailed and mailed to the last known email and physical addresses of the Defendant.

/s/ Megan E. Douglass
Megan E. Douglass, Esq.